

February 27, 2015

**Via Electronic Filing**

Ms. Marlene Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 Twelfth Street S.W.  
Washington, DC 20554

Re: Special Access Data Collection, WC Docket No. 05-25; RM-10593  
SystemMetrics Corporation  
FRN 0013385729


Dear Ms. Dortch:

With this letter, SystemMetrics Corporation ("SystemMetrics") files a public version of the following essay responses in the above-referenced Special Access Data Collection proceeding, in accordance with the *Order and Data Collection Protective Order*, DA-14-1424, adopted October 1, 2014: II.A.5, II.A.8, II.A.10, II.A.11 Part 2, II.A.18, II.A.19, II.D.1, II.D.2, II.F.8, II.F.9, II.F.10, II.F.11, and II.F.12.

SystemMetrics' responses have also been submitted via the Special Access Web Portal.

Please direct any questions regarding this matter to me at 808-546-3877 or at [steven.golden@hawaiiantel.com](mailto:steven.golden@hawaiiantel.com).

Sincerely,



Steven P. Golden  
Vice President, External Affairs

Attachment

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SystemMetrics Corporation

Question II.A.5

Provide a map showing the fiber routes that you (a) own or (b) lease pursuant to an *IRU* agreement that constitute your network, including the fiber *Connections* to *Locations*. In addition, include the locations of all *Nodes* used to interconnect with third party networks, and the year that each *Node* went live.

Response:

SystemMetrics provided its map and accompanying required documentation, which is considered "Highly Confidential Data", via the "Highly Confidential" upload section of the Special Access Web Portal.

SystemMetrics Corporation

Question II.A.8:

Explain your business rule(s) used to determine whether to build a *Connection* to a particular *Location*. Provide underlying assumptions.

- a. Describe the business rules and other factors that determine where you build your *Connections*. Describe the business rules and other factors that determine where you build your *Connections*. Examples of such rules/factors are minimum *Term Commitments* or minimum capacity commitments by the buyer; maximum build distances from the building to your core network; and/or number of competitors in the area. Include, also, any factors that would prevent you from building a *Connection* to an otherwise suitable *Location*. These could be factors that are under your control or those that are not.
- b. Explain how, if at all, business density is incorporated into your business rule, and if so, how you measure business density.
- c. In areas where your business rule has been most successful, explain why. Provide examples of geographic regions (if any) where you generally were or are able to successfully deploy *Connections*, and where you generally have experienced or currently experience serious difficulties in deploying *Connections*, and, if you are able to provide examples of both kind of regions, indicate what distinguishes these different regions.

Response:

SystemMetrics uses general business analysis to determine whether to build a connection to a particular location.

- a. SystemMetrics considers all of the following factors when considering building a new connection: **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]**

[REDACTED]

SystemMetrics Corporation (cont'd.)

b.

[REDACTED]

c.

[REDACTED]

[END HIGHLY CONFIDENTIAL INFORMATION]



SystemMetrics Corporation

Question II.A.10:

Provide data, maps, information, marketing materials, and/or documents identifying those geographic areas where you, or an Affiliated Company, advertised or marketed Dedicated Service over existing facilities, via leased facilities, or by building out new facilities as of December 31, 2013, or planned to advertise or market such services within twenty-four months of those dates.

Response:

SystemMetrics provides Dedicated Services within the downtown business district of Honolulu, on the island of Oahu. See Attachment 1 for a map of Honolulu. Marketing materials are found on the Company's website at [www.systemmetrics.com](http://www.systemmetrics.com), and samples from the website are also provided in Attachment 1. **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]**

[REDACTED]

[REDACTED]

**[END HIGHLY CONFIDENTIAL INFORMATION]**

SystemMetrics' affiliates include Hawaiian Telcom, Inc., Hawaiian Telcom Services Company, Inc. and Wavecom Solutions Corporation.

Hawaiian Telcom, Inc. markets *Dedicated Services* on the islands of Kauai, Oahu, Maui, Molokai, Lanai and Hawaii in the state of Hawaii. See Attachment 2 for a map of the state of Hawaii. Marketing materials are found on the Company's website at [www.hawaiiantel.com](http://www.hawaiiantel.com). Attachment 2 also includes examples from the website.

Hawaiian Telcom Services Company, Inc. markets *Dedicated Services* on the islands of Kauai, Oahu, Maui, Molokai, Lanai and Hawaii in the state of Hawaii. See Attachment 2 for a map of the State of Hawaii. Marketing materials are found on the Company's website at [www.hawaiiantel.com](http://www.hawaiiantel.com). Also see Attachment 2 for examples from the website.

SystemMetrics Corporation (cont'd)

Wavecom was acquired by Hawaiian Telcom, Inc. ("HTI") on December 31, 2012<sup>1</sup>, and

[BEGIN HIGHLY CONFIDENTIAL]

[END HIGHLY CONFIDENTIAL]

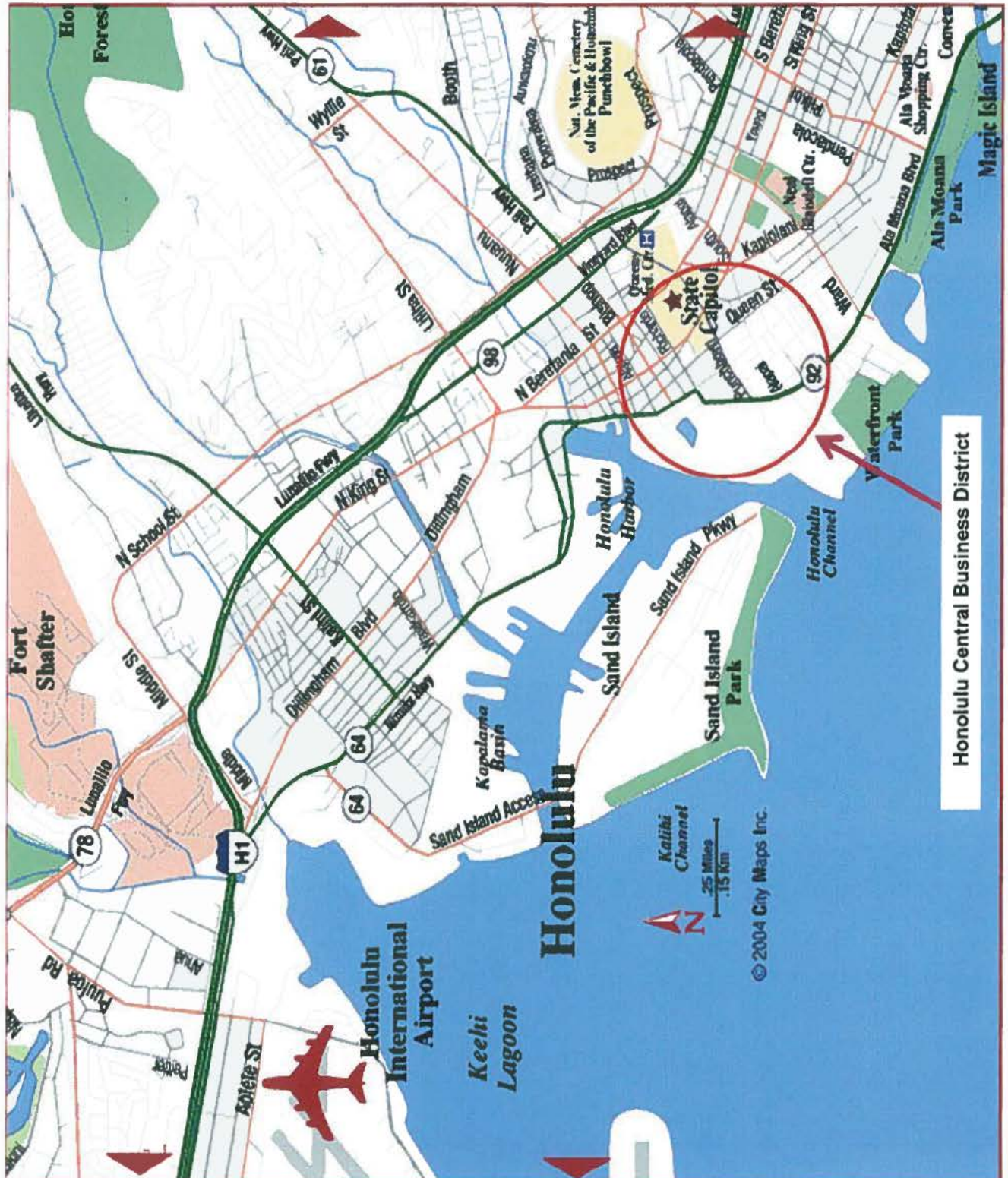
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<sup>1</sup> See Federal Communications Commission WC Docket No. 12-206, *In the Matter of Wavecom Solutions Corporation, Transferor and Hawaiian Telcom, Inc., Transferee; Application for Consent to Transfer Control*, and Hawaii Public Utilities Commission Docket No. 2012-0174, *In the Matter of the Application of Hawaiian Telcom, Inc. and Wavecom Solutions Corporation For an Exemption or Waiver from all Regulatory Requirements, or in the Alternative, Approval of the Share Purchase Transaction and Related Transactions*



Map of Honolulu  
SystemMetrics Corporation  
Geographic Area

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Honolulu Central Business District

## SystemMetrics Corporation Dedicated Services



Call or click here for a free consultation  
**(808) 791-7000**

Services About Us Support Center Customer Payments Contact Us

Virtual Colocation Colocation Network Services VoIP Services Backup Services

Home > Services > Network Services

### Network Services

#### Engineered Private Connectivity Solutions (EPCS)

SystemMetrics's engineering expertise enables businesses to overcome the challenges presented by more conventional network bandwidth offerings.

#### Engineered Private Connectivity Solutions (EPCS)

SystemMetrics Engineered Private Connectivity Solutions (EPCS) provide businesses with the ability to connect multiple sites privately and securely. This creates a Wide Area Network (WAN) which extends the corporate internal network to all locations. Customer sites may utilize different transport mediums at different sites based on their specific requirements, while SystemMetrics provides the overall unification of the private customer network mediums. EPCS can provide Quality of Service (QoS), routed and switched connectivity to multi-site or site-to-offsite computing environments.

#### Benefits

- **Flexibility** – EPCS supports different data circuit mediums at each customer site. Quality of Service can give priority to certain types of traffic such as VoIP and video conferencing.
- **Scalability** – Additional sites are easily added to the corporate network.
- **Efficiency** – EPCS enhances efficiency by optimizing the data path between locations, while boosting performance and reducing equipment requirements at each site.

#### Commercial Internet Access

SystemMetrics provides redundant-carrier Internet access over a variety of connection mediums up to 1Gbps. Internet delivery may include DSL, DS1 (or T1), Ethernet over Fiber, DS3, OC-3, and Commercial Point-to-Point Wireless solutions. Internet is delivered via a blend of multiple carriers, ensuring that businesses achieve peak performance and availability. (Multiple carriers mean better Internet routing options and greater uptime.)

SystemMetrics can also provide custom BGP options for enterprise customers looking to diversify their Internet connectivity options. For Hawaii-based Internet customers, SystemMetrics Internet Access includes the Internet Exchange between different ISPs and Internet carriers in Hawaii. This Internet Exchange optimizes Internet routing within the State of Hawaii, resulting in optimal Internet performance. We can also provide managed, firewalled connectivity to customers — further reducing customer equipment and maintenance requirements.

#### Benefits

- **Optimal Performance** – Connection speeds of up to 1Gbps Internet access, with optimal routing provided via multiple carrier routes and included Internet Exchange.
- **Reliability** – Multiple carrier connections maintain customer Internet access during carrier maintenance windows; customers remain online, at all times.
- **Flexibility** – There a number of available options for Internet Access Delivery, ranging from DSL to Gigabit Ethernet over fiber, with wireless delivery solutions also available; all connections are typically provided to customer in a familiar Ethernet handoff.

#### 24x7 Support with 99.99% Uptime Guarantee

At SystemMetrics, we take our network engineering very seriously, along with our mission to provide Hawaii's businesses with the highest quality data transport available. Our engineers and network are available for your business on a 24/7 basis, and we back our services with a 99.99% uptime guarantee (which we consistently exceed). Our redundant connectivity, superior engineering, and around-the-clock monitoring make us uniquely qualified to handle the most critical of your business connectivity needs.

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### Get more info

Business solutions are customized to your business needs. Talk to a sales consultant to get more information.

#### Request a call back

Name

Company

Email

Phone

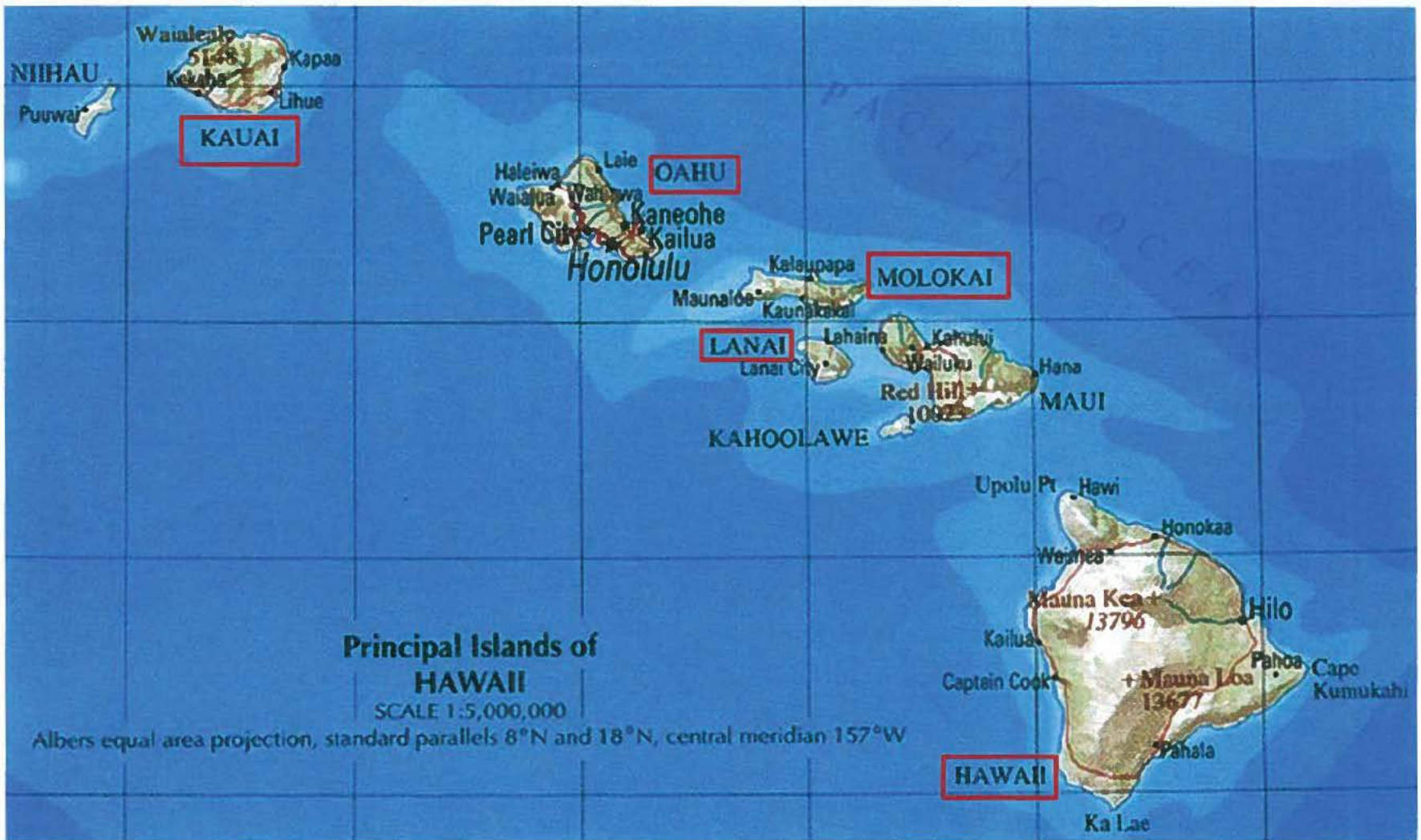
[Submit Request](#)

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## Hawaiian Telcom, Inc. and Hawaiian Telcom Services Company, Inc. Dedicated Services Offerings for Large Business

**RESIDENTIAL** **BUSINESS** **WHOLESALE** **ABOUT US**

Call or click here for a free consultation  
**643-0944**

**Hawaiian Telcom**

Products Solutions Support

Home > Business > Large Business

**LARGE BUSINESS**

**Innovation to take your business to the next level.**  
We help companies with advanced solutions that extend beyond voice to data, managed services and the cloud.  
[View Cloud Services](#)

**Get In Touch**  
Talk to your company's Hawaiian Telcom account representative or initiate a new consultation about how we can help.  
[Contact Us](#)

**Products**  
Our unmatched portfolio of leading edge communications services will help you take your business to the next level.  
► **Business Voice**  
► **Broadband & Private Networks**  
► **Cloud Services**  
► **Managed Services**  
► **Partner Solutions**  
► **Security**  
► **Wireless**

**Solutions**  
We provide solutions to many of Hawaii's largest companies across a wide range of industries.  
► **Solutions by Industry**  
► **Communication and Connectivity**  
► **Security**

**Featured Product**  
**Hosted Voice**  
Designed to keep you connected to your customers and your employees no matter where your business takes you.  
► [Learn more](#)

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## Hawaiian Telcom, Inc. and Hawaiain Telcom Services Company, Inc. Dedicated Services Offerings for Large Business

The screenshot shows the Hawaiian Telcom website's 'Large Business' section. At the top, there is a navigation bar with tabs for 'RESIDENTIAL', 'BUSINESS', 'WHOLESALE', and 'ABOUT US'. A search bar is located on the right. Below the navigation bar, the Hawaiian Telcom logo is on the left, and a call-to-action 'Call or click here for a free consultation 643-0944' is on the right. A secondary navigation bar contains 'Products', 'Solutions', and 'Support'. Below this, a breadcrumb trail reads 'Home > Business > Large Business > Products > Broadband & Private Networks'. The main heading 'LARGE BUSINESS' is on the right. The central content area features a large orange box with the text 'We're all about the fastest connection.' and a smaller box below it stating 'Our networks can provide you with the speed and bandwidth to meet any need.' To the right of this text is a photograph of a fiber optic cable being inserted into a port. Below the main heading, the section 'BUSINESS BROADBAND & PRIVATE NETWORKS' is introduced. A paragraph explains that in the age of global connectedness, businesses need reliable, high-speed Internet connections. Another paragraph states that Hawaiian Telcom provides reliable, high-speed Internet connections and robust, dependable networking solutions. Below this, two columns of services are listed: 'Business Broadband' (Ethernet Dedicated Internet Access, Business High-Speed Internet) and 'Private Network Solutions' (Switched Ethernet, IP VPN). At the bottom, a footer contains links for 'Small & Medium Business', 'Large Business', and 'Government', along with 'Support', 'View & Pay Bill', 'Contact Us', and 'Order Services'. A final call-to-action 'Call for a free consultation 643-0944' is on the right, accompanied by Facebook and Twitter social media icons.

RESIDENTIAL BUSINESS WHOLESALE ABOUT US

Search  GO

Hawaiian Telcom

Call or click here for a free consultation  
**643-0944**

Products Solutions Support

Home > Business > Large Business > Products > Broadband & Private Networks

**LARGE BUSINESS**

**We're all about the fastest connection.**

Our networks can provide you with the speed and bandwidth to meet any need.

**BUSINESS BROADBAND & PRIVATE NETWORKS**

In the age of global connectedness, you can't afford to be left in the slow lane. Whether it's consulting with colleagues, video-conferencing with suppliers or analyzing business intelligence, you rely on your network to keep you connected. That's why we offer Hawaii businesses a portfolio of Internet services that provide all the bandwidth and speed you need.

With Hawaiian Telcom as your trusted Internet services partner, you can count on reliable, high-speed Internet connections and robust, dependable networking solutions to keep you online and connected — all at a price that doesn't dent your bottom line.

**Business Broadband**

- ▶ Ethernet Dedicated Internet Access
- ▶ Business High-Speed Internet

**Private Network Solutions**

- ▶ Switched Ethernet
- ▶ IP VPN

Small & Medium Business | Large Business | Government

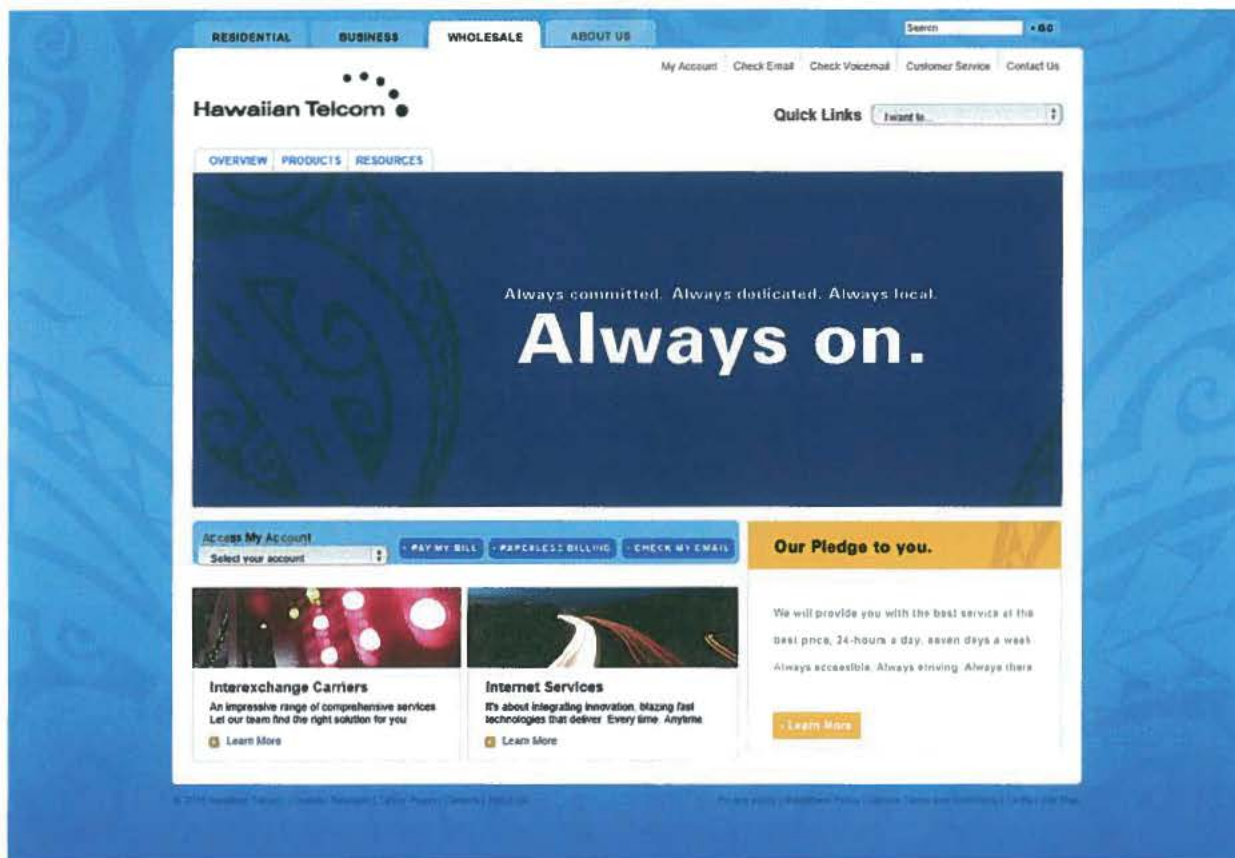
Support | View & Pay Bill | Contact Us | Order Services

Call for a free consultation  
**643-0944**

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**Hawaiian Telcom, Inc.**  
**Dedicated Services Offerings for Wholesale Customers**



**REDACTED – FOR PUBLIC INSPECTION**

SystemMetrics Corporation

Question II.A.11 Part 2:

Lastly, identify the business rules you rely upon to determine whether to submit a bid in response to an RFP.

Response:

Response to this question is optional. SystemMetrics elects not to provide a response.

SystemMetrics Corporation

Question II.A.18:

If you offer *Dedicated Services* pursuant to an agreement or *Tariff* that contains either a *Prior Purchase-Based Commitment* or a *Non-Rate Benefit*, then explain how, if at all, those sales are distinguishable from similarly structured *ILEC* sales of *DS1s*, *DS3s*, and/or *PBDS*.

Response:

[BEGIN HIGHLY CONFIDENTIAL INFORMATION]

[END HIGHLY CONFIDENTIAL INFORMATION]



SystemMetrics Corporation

Question II.A.19:

Provide the business justification for the *Term* or *Volume Commitments* associated with any *Tariff* or agreement you offer or have in effect with a customer for the sale of *Dedicated Services*.

Response:

[BEGIN HIGHLY CONFIDENTIAL INFORMATION]

[REDACTED]

[REDACTED]

[END

HIGHLY CONFIDENTIAL INFORMATION]

SystemMetrics Corporation

Question II.D.1:

Describe your company's short term and long-range promotional and advertising strategies and objectives for winning new – or retaining current – customers for Dedicated Services. In your description, please describe the size (e.g., companies with 500 employees or less, etc.), geographic scope (e.g., national, southeast, Chicago, etc.), and type of customers your company targets or plans to target through these strategies.

Response:

SystemMetrics' short term promotional and advertising strategies are focused on  
[BEGIN HIGHLY CONFIDENTIAL INFORMATION]

[REDACTED]

[REDACTED]

[END HIGHLY CONFIDENTIAL INFORMATION]

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SystemMetrics Corporation

### Question II.D.2:

Identify where your company's policies are recorded on the following Dedicated Service-related processes: (a) initiation of service; (b) service Upgrades; and (c) service Disconnections. For instance, identify where your company records recurring and non-recurring charges associated with the processes listed above. If recorded in a Tariff, provide the specific Tariff section(s). If these policies are recorded in documents other than Tariffs, list those documents and state whether they are publicly available. If they are publicly available, explain how to find them. For documents that are not publicly available, state whether they are conveyed to customers orally or in writing.

### Response:

SystemMetrics' policies are listed in its Master Service Agreement (MSA), which is provided to all new customers for review. While the MSA is not publically available, any potential customer is able to review the document prior to signing an agreement with the company. Every customer who enters into an agreement with SystemMetrics for services must sign and acknowledge the MSA prior to services being rendered. The terms are also conveyed verbally to customers when they inquire about a process that is covered under the MSA.



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SystemMetrics Corporation

Question II.F.8:

II.F.8. (Optional) Explain whether the terms and conditions of any *Tariff* or contract to which you are a party for the purchase of *Dedicated Services* or the policies of any of your *Providers* constrain your ability to:

- a. Decrease your purchases from your current *Provider(s)*;
- b. Purchase services from another *Provider* currently operating in the geographic areas in which you purchase services;
- c. Purchase non-tariffed services, such as Ethernet services, from your current *Provider* of tariffed *DS1*, *DS3*, and/or *PBDS* services or from other *Providers* operating in the geographic areas in which you purchase tariffed services;
- d. Contract with *Providers* that are considering entering the geographic areas in which you purchase tariffed services;
- e. Move circuits, for example, moving your *DS1* and/or *DS3 End-User Channel Terminations* to connect to another *Transport Provider*; or
- f. Otherwise obtain *Dedicated Services* or change *Providers*.

Response:

SystemMetrics elects not to respond to this optional question.

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SystemMetrics Corporation

Question II.F.9:

II.F.9. (Optional) If you purchase, or purchased, *Transport Service* and *End User Channel Terminations* from the same *Provider*, explain your experience with changing *Transport Service* from one *Provider* to another between January 1 and December 31, 2013 while keeping your *End User Channel Terminations* with the original *Provider*. Where appropriate, identify the *Provider(s)* in your responses below and indicate whether they are an *ILEC* or a *Competitive Provider*.

- a. How many times did you change *Transport Service* while keeping your *End User Channel Terminations* with the original *Provider*? An estimate of the number of circuits moved to a new *Transport Provider*, or the number of such changes requested, is sufficient.
- b. What was the length of time, on average, it took for the original *Provider* to complete the process of connecting your last-mile *End-user Channel Terminations* to another *Transport Provider*? An estimate is sufficient.
- c. Were you given the opportunity to negotiate the amount of time it would take to complete the process of connecting your *End User Channel Terminations* to another *Transport Provider* on a case-by-case basis? In answering this question, also describe and provide citations to the *ILEC's* or *Competitive Provider's* policies, rules or, where relevant, *Tariff* provisions, if known, explaining the transition process.
- d. How did connecting to a new *Transport Provider* impact the rate you paid for the *End User Channel Terminations* you continued to purchase from the original *Provider*?
- e. Did connecting to a new *Transport Provider* typically impact the rate you continued to pay for *Transport Service* from the original *Provider* while the change in *Transport Providers* remained pending? If so, how? What was the average percentage change in rates? For example, did you ever pay a *One Month Term Only Rate* during that time?

Response:

SystemMetrics elects not to provide a response to this optional question.

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SystemMetrics Corporation

### Question II.F.10:

II.F.10. (Optional) Describe any circumstances since January 1, 2013, in which you have purchased circuits pursuant to a *Tariff*, solely for the purpose of meeting a *Prior Purchase-Based Commitment* required for a discount or *Non-Rate Benefit* from your *Provider* (i.e., you would not have purchased the circuit but for the requirement that you meet a *Volume Commitment* required for a discount or *Non-Rate Benefit* from your *Provider*). In your description, provide at least one example, which at a minimum, lists:

- a. The name of the *Provider* providing the circuits at issue;
- b. A description of the *Prior Purchase-Based Commitment*;
- c. The *Tariff* and section number(s) of the specific terms and conditions described;
- d. The number of circuits you would not have purchased but for the *Prior Purchase-Based Commitment* requirement to receive a discount or *Non-Rate Benefit*;
  - i. Of the circuits reported in II.F.10.d, how many did you not use at all?
- e. A comparison of the dollar amount of the unnecessary circuit(s) purchased versus the dollar amount of penalties your company would have had to pay under the *Prior Purchase-Based Commitment* had it not purchased and/or maintained the circuit(s), and a description of how that comparison was calculated.
- f. How many circuits were activated under the identified *Tariff* plan and not used when you initially entered into the plan? What were these unused circuits as a percent of the total circuits currently purchased under this *Tariff* plan? Indicate the percent of the total circuits currently purchased under this *Tariff* plan that exceed your *Prior Purchase-Based Commitment*.
- g. For the *Prior Purchase-Based Commitment*, indicate whether you are able to buy any *DS1s* or *DS3s* from the *Provider* outside of the identified *Tariff* plan, or are you required to make all purchases from the *Provider* pursuant to the identified *Tariff* plan?

### Response:

SystemMetrics elects not to provide a response to this optional question.



SystemMetrics Corporation

Question II.F.11

For each year for the past five years, state the number of times and in what geographic area(s) you have switched from purchasing End-User Channel Terminations from one Provider of Dedicated Services to another.

Response:

[BEGIN HIGHLY CONFIDENTIAL INFORMATION]

[REDACTED]

[REDACTED]

b.

[REDACTED]  
CONFIDENTIAL INFORMATION]

[END HIGHLY



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SystemMetrics Corporation

Question II.F.12:

II.F.12. (Optional) Explain the circumstances since January 1, 2013 under which you have paid *One Month Term Only Rates* for DS1, DS3, and/or PBDS services and the impact, if any, it had on your business and your customers. In your response, indicate any general rules you follow, if any, concerning the maximum number of circuits and maximum amount of time you will pay *One Month Term Only Rates*, and your business rationale for any such rules.

Response:

SystemMetrics elects not to provide a response to this optional question.